

**UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY**

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FREEDOM MORTGAGE CORPORATION,	:	Civil Action No.
	:	16-cv-02569-RMB-KMW
Plaintiff,	:	
	:	
v.	:	
	:	
LOANCARE, LLC (as successor to FNF:	:	DECLARATION OF
Servicing, Inc. and LoanCare, a Division of:	:	<u>JERRY A. CUOMO</u>
FNF Servicing, Inc.),	:	
	:	
Defendant.	x	

JERRY A. CUOMO hereby declares as follows pursuant to 28 U.S.C. § 1746:

1. I am a member of Landman Corsi Ballaine & Ford, P.C., counsel of record for plaintiff Freedom Mortgage Corporation (“Freedom”). I am a member in good standing of the Bar of the State of New Jersey and of this Court.

2. I make this Declaration in support of Freedom's motion for an order admitting Mark S. Landman, Esq. to practice before this Court *pro hac vice* in this case as counsel for Freedom.

3. Mr. Landman is an attorney with Landman Corsi Ballaine & Ford P.C. and is a member in good standing of the bars of the United States District Courts for the following Districts: Southern District of New York; Eastern District of New York; Western District of New York; Northern District of New York; District of Columbia; Eastern District of Pennsylvania; Northern District of Illinois; Eastern District of Michigan and District of Connecticut.

4. Mr. Landman is a member in good standing of the bars of the United States Supreme Court and the United States Courts of Appeal for the Second, Fourth, Sixth, Ninth and Eleventh Circuits.

5. Mr. Landman is a member in good standing of the bars of the following state courts:
New York, Pennsylvania and the District of Columbia.

6. Mr. Landman has not been denied admission or disciplined by any court.

7. I will comply with L.Civ.R. 101.1(c) and will be held responsible for the conduct of Mr. Landman. I will assure that Mr. Landman shall comply with L.Civ.R. 101.1(c).

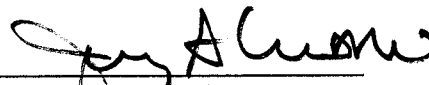
8. Payment as required by L.Civ.R. 101.1(c)(2) and (3) will be made to the New Jersey Lawyers' Fund for Client Protection and the Clerk of the Court on behalf of Mr. Landman upon his admission *pro hac vice*.

9. I have personally conferred with counsel for defendant Loancare, LLC, who has consented to Mr. Landman's *pro hac vice* admission to represent Freedom in this case.

10. For these reasons, Freedom requests that the Court enter an order admitting Mr. Landman *pro hac vice* for the purpose of representing Freedom in this case.

11. Pursuant to 28 U.S.C. § 1746, I hereby declare under penalty of perjury that to the best of my knowledge the foregoing is true and correct.

Dated: July 14, 2016
Newark, NJ



Jerry A. Cuomo